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November 7, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: Ex Parte Communication in CS Docket No. 97-80

Dear Ms. Dortch:

This is to notify you that on November 4, 2005, William Check and Neal Goldberg of the National Cable & Telecommunications Association, Jud Cary of Cable Television Labs, and Paul Glist, Cole, Raywid, & Braverman, counsel to CableLabs, met with William Johnson, Natalie Roisman, Steve Broeckaert and Mike Lance, all of the Media Bureau. The meeting was held to discuss the Ex Parte filed by Verizon on October 20, 2005 in this docket.

Verizon has taken issue with the cable industry's use of DOCSIS for return signaling. Because Verizon has chosen to engineer its network with no RF return path, it has requested engineering changes by cable and interactive CableCARD-enabled DTVs to use Ethernet as a return path. Verizon has also urged that cable systems should not use coaxial cable as a home network, stating that "Consumers do not want the cable network to be their home network."

The cable industry's use of DOCSIS is an essential part of interactive cable communication and is already integrated in silicon for set-tops and DTV chips. The DOCSIS standard has also led to inexpensive cable modems and has spurred direct DSL competition. Initiated by CableLabs, DOCSIS is now a world wide International Telecommunications Union (ITU) standard (see J.122 and J.126).

Verizon's request would require an Ethernet connection, in addition to the coax F-connector, for every TV connection in the home. This is illustrated by an installation in Keller, Texas, shown in attachment 1. Use of existing coaxial cable inside the home reduces home wiring, makes use of existing F connectors on televisions, and provides higher bandwidth and Quality of Service capabilities needed for high-quality video distribution throughout the home. As shown in Attachment 2, Verizon itself makes use of coaxial cable inside the home. [Source: Verizon Laboratories, July, 2005]. Presumably, this is what was intended by the FCC's efforts

in cable home wiring regulation. We expect there to be multiple, competing home networks, of which coax may be one. CableLabs also participates in organizations like the UPnP Forum, and Digital Living Network Alliance (DLNA), to develop other means for home devices to interact. In fact, the products certified to date in the CableLabs' CableHome project include 802.11b/g and HomePlug. In these fora, the cable industry seeks to interface to other home network architectures.

Verizon is building in a greenfield, and is able to implement many solutions other than seeking to impose on other parties the cost of translating DOCSIS signaling into a format matching its own upstream network. Verizon could install functionality inside its optical network unit to translate return signaling to its own network. This would assign the cost of Verizon's network choices to Verizon, without dictating network or home network choices by others.

Verizon also takes issue with "cable centric" standards. As noted in NCTA's Reply Comments in MB 05-255, Verizon has used cable-initiated standards for MPEG-2, connectors [ANSI/SCTE 01 1996R2001 and ANSI/SCTE 02 1997], frequency plan [ANSI/SCTE 40 2004], quadrature amplitude modulation (QAM) [ITU J.83-B], digital transmission standards [ANSI/SCTE 07 2000], content encryption [ANSI/SCTE 52 2003], closed caption carriage [ANSI/SCTE 20 2004], and copy protection [ANSI/SCTE 41 2004]. CableLabs specifications are drafted with input from more than 500 CE, IT, content, and other non-cable companies, as well as the public.[1] Most CableLabs specifications are then submitted to traditional standards bodies such as the ANSI/SCTE, ATSC, CEA, DVB, and even the ITU for world-wide adoption. To require a multi-industry standards process (that include cable competitors) before innovation or market advances would significantly delay the development of competitive offerings to consumers, and would open up the specification development process to political gaming—such as efforts to hobble DOCSIS and competing home networks.

Respectfully submitted,

Paul Glist

cc. William Johnson
Natalie Roisman
Steve Broeckaert
Mike Lance

[1] *See, e.g.*, NCTA Reply Comments, MB Docket 05-255, October 11, 2005, at 28-31; NCTA Reply Comments, CS Docket No. 97-80, Apr. 28, 2003, at 22-25; NCTA Comments, CS Docket No. 97-80, Feb. 13, 2004, at 8-11; NCTA Reply Comments, Mar. 15, 2004, at 8-10.

Attachment 1: Verizon installation in Keller, TX
[Source: http://www.i4u.com/article4365.html.]

Attachment 2: Verizon Use of Coaxial Wiring